ATTACHMENT J.4.104

MANAGEMENT PLAN, APPENDIX N

ENVIRONMENTAL SAFETY AND HEALTH PROGRAM IMPLEMENTATION PLAN

RM-0016

MANAGEMENT PLAN

RM-0016

APPENDIX N

FEMP ENVIRONMENTAL SAFETY AND HEALTH PROGRAM IMPLEMENTATION PLAN

APPROVAL
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FEMP ENVIRONMENTAL SAFETY AND HEALTH PROGRAM IMPLEMENTATION PLAN

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FEMP ENVIRONMENTAL SAFETY AND HEALTH PROGRAM IMPLEMENTATION PLAN

INTRODUCTION

The heart of FEMP's Environmental Safety and Health (ES&H) Program is the firm commitment by all FEMP personnel to prevent accidents and the conditions that could lead to injuries or endanger the environment. Every employee is held accountable for, and is solely responsible for, successfully enforcing the ES&H Program. For this document, the terms **FEMP Personnel** and **Employee(s)** include anyone performing activities for FEMP. The term FEMP applies to the actual FEMP site and all offsite locations under Fluor Daniel Fernald (FDF) jurisdiction.

The Environmental Safety and Health Program Implementation Plan (ES&H PIP) provides the framework for FDF's proactive ES&H Program, serves as a roadmap to the program's implementation, incorporates integrated safety management, and describes the comprehensive and integrated management organizations and support systems that implement the program.

The ES&H PIP describes FDF's strong sense of management commitment to, and leadership of, the ES&H program; identifies meaningful goals and expectations that extend beyond mere compliance; specifies clear and succinct roles, responsibilities, and authorities, and incorporates Integrated Safety Management.

The objective of Integrated Safety Management is the integration of safety into all facets of work planning and execution. In other words, the overall management of safety functions and activities becomes an integral part of mission accomplishment. This approach to safety management incorporates seven Guiding Principles and five Core Functions, along with the mechanisms and responsibilities necessary for their implementation. The Guiding Principles and Core Functions are listed below, along with references to FDF documentation that describes the mechanisms and responsibilities for implementation.

Line Management Responsibility for Safety

Line management is directly responsible for the protection of the public, the workers, and the environment. The term line management means all levels of leadership in the organization responsible for accomplishing a particular mission, either project or programmatic. This Guiding Principle is addressed in the **MANAGEMENT COMMITMENT** section of this document.

Clear Roles and Responsibilities

Clear and unambiguous lines of authority and responsibility for ensuring safety are established and maintained at all organizational levels. The leadership responsible for accomplishing project or programmatic work is also responsible for ES&H performance during the accomplishment of that work. Roles and responsibilities for performing organization (line) managers and functional area managers are addressed in sections 2.0 and 3.0 of RM-0016, *Management Plan*, respectively. Additional information on roles and responsibilities is contained in FDF organization charts, Work Breakdown Structure scopes of work, Project Execution Plans, and Project Management Plans.

Define the Scope of Work

Missions are translated into work, expectations are set, tasks are identified and prioritized, and resources are allocated. This is addressed in the site's Project Control System, as described in site procedures under the Project Controls Functional Area, and the associated Work Breakdown Structure contained in the project baseline. Enhanced Work Planning and Project Execution Plans expand upon this Core Function for project activities.

Analyze the Hazards

Hazards associated with the work are identified, analyzed and categorized. This is addressed by the **WORKSITE ANALYSIS** section of this document.

Develop and Implement Hazard Controls

Applicable standards and requirements are identified and agreed-upon, Enhanced Work Planning is accomplished, controls to prevent/mitigate hazards are identified, the safety envelope is established, and controls are implemented. This is addressed by the **MANAGEMENT COMMITMENT, Compliance with DOE-Prescribed ES&H Standards, Worksite Analysis**, and **HAZARD PREVENTION AND CONTROL** sections of this document.

Perform Work within Controls

Readiness is confirmed and work is performed safely. This is addressed through demonstrations of readiness (e.g., Enhanced Work Planning, Operational Readiness Reviews, Standard Start-Up Reviews) and requirements and procedures contained in the Operations, Nuclear & System Safety, Occupational Safety & Health, Fire Protection, and Radiological Protection Functional Areas.

Provide Feedback and Continuous Improvement

Feedback information on the adequacy of controls is gathered, opportunities for improving the definition and planning of work are identified and implemented, and line and independent oversight is conducted. This is addressed in the **WORKSITE ANALYSIS** section of this Appendix, most notably in the **Analysis of Facilities, Processes, or Equipment, Compliance Inspections, Assessment and Appraisal Programs**, and **Performance Analysis** subsections.

Competence Commensurate with Responsibilities

Personnel must possess the experience, knowledge, skills, and abilities that are necessary to discharge their responsibilities. This is addressed in the **ES&H TRAINING** section of this document. In addition, Project Execution Plans identify training programs for projects, and job-specific training is provided for Project Managers, Project Engineers, and Construction Managers, as well as for positions listed in the Training Implementation Matrix that was developed to meet the implementation requirements of DOE 5480.20A.

Balanced Priorities

Resources are effectively allocated to address safety, programmatic, and operational considerations. Protecting the public, the workers, and the environment is a priority whenever activities are planned and performed. The cost of ES&H activities associated with a work scope is an integral part of the cost of accomplishing that work scope. This is addressed in the **MANAGEMENT COMMITMENT, Senior Management Commitment** portion of this document.

Identification of Safety Standards and Requirements

Before work is performed, the identified hazards are evaluated and an agreed-upon set of safety standards and requirements are established which, if properly implemented, will provide adequate assurance that the public, the workers, and the environment are protected from adverse consequences. This is addressed in the **WORKSITE ANALYSIS** and **MANAGEMENT COMMITMENT, Compliance with DOE-Prescribed ES&H Standards** portions of this document. The key element of this Guiding Principle is the site Standards/Requirements Identification Documents (S/RIDs), which are found in Section 3.8 of RM-0016, *Management Plan*. Applicable standards may be further defined in Project Execution Plans for specific scopes of work.

Hazard Controls Tailored to Work Being Performed

Administrative and engineering controls to reduce and mitigate hazards are tailored to the work being performed and identified hazards. This is addressed in the **HAZARD PREVENTION AND CONTROL** section of this document.

Operations Authorization

The conditions and requirements to be satisfied for operations to be initiated and conducted are clearly established and agreed upon. This process is defined in Project Execution Plans and is accomplished through preparation of appropriate safety documentation (e.g., Safety Analysis Reports, Basis for Interim Operation, Auditable Safety Records, Safety Assessments), and demonstrations of readiness (e.g., Operational Readiness Reviews, Standard Start-Up Reviews). In addition, work control documents such as procedures and permits may include conditions that must be satisfied in order for work to proceed. This Guiding Principle is addressed in site requirements and procedures contained in the Operations, Nuclear & System Safety, Occupational Safety & Health, Fire Protection, and Radiological Protection Functional Areas.

RM-0016, *Management Plan*, Section 3.8, Standards/Requirements Identification Document (S/RID), specifies the external requirements that drive the ES&H Program and provides the titles for the external requirements referenced throughout this plan. The internal requirements, plans, and procedures that implement the various components of the ES&H Program are listed in Attachment A.

Through the Safety First Initiative, FDF and DOE are working together to improve the FEMP safety culture and demonstrate their commitment to affect change in the following key areas: management commitment, employee involvement, ES&H training, worksite analysis, and hazard prevention and control. Senior leadership maintains commitment to the Safety First Initiative by identifying and communicating applicable ES&H requirements to all personnel, and obtaining and demonstrating FDF team leadership and union leadership buy-in and ownership of environmental safety and health as the number one priority.

Through compliance with the National Environmental Policy Act (NEPA), FDF is committed to addressing environmental concerns before they pose a threat to the quality of the environment or public welfare (PL-3025 and PL-1002).

The FDF President chartered specific functional area managers (FAM) with the authority and responsibility for establishing ES&H standards and practices and for developing and implementing ES&H policies, plans, requirements, procedures, and activities.

ES&H Organizations

FDF ensures that the ES&H Program provides clear leadership with accountable responsibilities through the organizational structures. The ES&H organizations evaluate the effectiveness and implementation of ES&H policies, requirements, and standards by encouraging feedback from workers and line supervision for program improvements and providing team leadership with strength and weakness recommendations for improvement of ES&H program performance.

The ES&H Program provides ES&H support to all FEMP organizations through the Safety First Initiative and by developing and communicating guidance, requirements, plans, and procedures as represented in Attachment A.

The ES&H Program supports FDF project organizations in their activities by providing ES&H technical guidance and matrixing personnel to those organizations to ensure protection of the environment and the safety and health of employees and the public.

Note: Safety and health representatives are matrixed directly to each project through the Project Safety and Health organizations to provide integrated construction, industrial, and radiological safety expertise at the project level.

FEMP ENVIRONMENTAL SAFETY AND HEALTH PROGRAM IMPLEMENTATION PLAN

MANAGEMENT COMMITMENT

Fernald Mission Statement

Together, DOE and Fluor Daniel Fernald are committed to safely restoring the Fernald site to an end state which serves the communities' needs, and we will do this within a decade.

Environmental Safety and Health (ES&H) Policy

The safety and health of every individual and the protection of the environment are the cornerstones of the Fernald Environmental Management Project (FEMP) environmental restoration and waste management mission. No aspect of the FEMP mission is considered so important or urgent that employees should endanger themselves or others, or jeopardize the environment, in the performance of their duties.

To support environmental protection and safe and compliant work, senior team leadership established and administers an integrated ES&H Program that places Fluor Daniel Fernald's (FDF) highest priority on ensuring the safety and health of its employees and neighbors, and protecting the environment.

The heart of FEMP's ES&H Program is the firm commitment by all members of team leadership and FEMP employees to prevent accidents and the conditions that could lead to injuries or endanger the environment. All tasks incorporate methods that minimize the potential for accidents, exposure to hazardous materials, or unplanned releases to the environment.

Senior Management Commitment

Senior FDF leadership establishes the goals and objectives of the ES&H Program and integrates them with the yearly Work Plan and the Five-Year Plan compiled by Project Controls. Control Teams matrixed from Project Controls work closely with team leadership to develop ES&H implementation plans with milestones, budget, staffing, and planned evaluations.

Senior leadership maintains commitment to ES&H by allocating sufficient resources to staff and operate ES&H organizations and maintain an effective ES&H Program. FDF conducts its ES&H Program in compliance with all Executive Orders, Department of Energy (DOE) Orders and Policy Statements, regulatory requirements, and agreements affecting FEMP.

ES&H Program

FDF's integrated ES&H Program ensures compliance with all applicable environmental protection, occupational safety and health, radiological protection, safety analysis, and medical DOE Orders and applicable Federal, State, and local requirements as specified in the S/RID.

The ES&H Program complies with the safety and health program requirements specified in 29 CFR 1910.120 for hazardous waste sites. This document functions as the site-specific safety and health plan and augments FEMP's comprehensive Work Plan by providing information on the logistics and resources for safety and health required to reach the Work Plan's tasks and objectives. The ES&H Program addresses organizational structure; site characterization and analysis; site control; training; medical surveillance; engineering controls; work practices; and personal protective equipment (PPE).

Attachment A is a hierarchy of documents that implement the ES&H Program and provides the titles for FDF plans and internal requirements documents referenced throughout this plan. This document hierarchy represents safety and health documents implementing S/RIDS Nos. 3, 6, 9, 10 & 14 and environmental protection documents implementing S/RID No. 5. Documents affecting ES&H quality assurance and training are also represented. Environmental Restoration and Waste Management documents are not included in the ES&H hierarchy of documents.

- The Air Monitoring Program ensures that programs and systems are adequate to satisfy requirements and ALARA (As Low As Reasonably Achievable) objectives for monitoring and controlling asbestos fiber releases to the environment (PL-3018 and RM-0031). This program provides direction for selecting, operating, maintaining, and using state-of-the-art monitoring equipment to measure and document emissions. (S/RID No. 5).

- The Dosimetry and Instrumentation Program provides for radiological monitoring by issuing, collecting, and analyzing dosimeters and providing radiological equipment instrumentation. This program provides in-vivo monitoring, internal and external exposure evaluations, air sampling, and records management for personnel dosimeter records. (S/RID No. 14).

- The Emergency Preparedness Program provides for the maintenance and operation of the Emergency Operations Center and the Communications Center. This program coordinates and manages Occurrence Reporting and Processing System (ORPS) reports and records, and conducts emergency drills and exercises. (S/RID No. 3).

- The Fire Safety/Services Program provides fire safety services that include inspections, permits, mutual aid responses, fire extinguisher inspections, and alarm testing. This program provides for fire engineering services including fire codes, inspections, surveys, hazard assessment, and review and approval of project plans for fire safety engineering and emergency response. This program provides emergency response services including training, planning, and equipment maintenance. (S/RID No. 6).

FDF administers and monitors the ES&H Program through the integrated activities of the following organizations:

- Air Monitoring
- Dosimetry and Instrumentation
- Emergency Preparedness
- Fire/Safety Services
- Medical
- Occupational Safety and Health
- Radiological Control
- Safety Analysis
- Soil and Miscellaneous Media
- Water Monitoring

Additional FDF organizations integrate their activities with the ES&H organizations to provide support for continuously upgrading, improving, and modifying the ES&H Program as the nature of work changes.

- The Program Services organizations provide records management and centralized systems for maintaining and distributing ES&H controlled documents. (S/RID No. 8)

- Oprerations Assurance integrates the conduct of operations principles within all FEMP projects and activities and administers Operational Readiness Reviews (ORR), Readiness Assessments (RA), Standard Startup Reviews (SSR), the Lessons Learned Program, and leadership of the Independent Safety Review Committee. (S/RID No. 11)

- Project Controls matrixes Control Teams to the ES&H organizations that provide performance reporting and variance analysis, milestone tracking and statusing, budgeting, baselining/re-baselining, and resource planning and analysis. (S/RID No. 21).

- Quality Assurance interfaces with all functional areas and provides audits and assessments of administrative activities and technical standards. A Total Quality Management Team (TQM) provides the leadership for TQM planning and implementation. (S/RID No. 13).

- Training develops formal ES&H training programs, conducts ES&H training, and retains auditable training records for all FEMP personnel and visitors. (S/RID No. 16).

- Waste Programs Management ensures that the management of hazardous/radioactive wastes generated at FEMP (including generation, storage, disposal, and treatment) complies with requirements. This program initiates and manages corrective actions and provides guidance and oversight of hazardous waste storage and accumulation areas, RCRA and Toxic Substances Control Act (TSCA) container management, and RCRA Closure Plan/CERCLA Removal Action and Remedial Action integration activities for hazardous waste management units. (S/RID No. 17).

ES&H Professional Staff Qualifications

FDF is committed to developing a proficient and diverse workforce, knowledgeable of its roles and responsibilities, with the appropriate skill mix to meet the changing requirements and future needs of the Fernald site. To this end, FDF provides the resources to attract qualified and experienced individuals.

FDF developed and maintains an ES&H workforce that is proficient, accountable, and clear on its role at FEMP; has diversity in its perspective and experience; and has the skill mix to achieve the changing requirements and future needs of the site. All members of the ES&H organizations have the necessary qualifications by education, training, certification, experience, or some combination of the above (RM-0004), to administer the ES&H Program.

FDF selects and trains suitable ES&H professionals and empowers them to provide ES&H leadership. Annually, during the normal budgetary process, ES&H leadership reviews staffing to ensure that staffing levels are sufficient to support the ES&H Program.

FDF promotes career development by providing for continuing education, professional certification programs, and participation in professional organizations to advance the qualification level of ES&H personnel.

ES&H Policies and Procedures

RM-0016 provides FDF presidential policies and specifies the external requirements (S/RID) that drive the ES&H Program.

FDF established the programmatic aspects of maintaining effective centralized systems for developing, revising, controlling, and maintaining ES&H controlled sitewide, division, department, and section level documents. FDF solicits active employee involvement in the development of requirements documents (RM-0020, Revision and Control Section; RM-0021, Revision and Control Section) and procedures, provides for the centralized control and review of ES&H related documents (MS-1001, Site Procedure System; MS-1002, Control of Plans and Internal Requirements Documents; and 602-0002, Safety and Health Department Document Program), and administers ES&H document control and records management according to applicable DOE Orders and Federal and State regulations.

To assist in meeting all requirements, FDF created the following document hierarchy that orders controlled documents by their authority and requirements levels (Attachment A):

External Requirements
Policies
Internal Requirements
Plans
Procedures

- The Medical Program promotes the physical and mental well-being of FEMP personnel while providing for prompt and effective amelioration during emergency situations. This program provides occupational medicine programs and required medical surveillances and ensures that medical personnel, equipment, and procedures are maintained according to applicable standards and accepted industry practice. The Medical Program encourages wellness and fitness through an onsite facility and full time coordinator. (S/RID No. 10).

- The OS&H Program monitors the development and implementation of programs governed by 29 CFR 1910 and 29 CFR 1926. This program facilitates safe operations by ensuring that all activities are conducted within approved and analyzed conditions conducive to worker safety and health. The OS&H Program focuses on reducing employee injuries and exposures to hazardous materials by creating a safe workplace through identifying, evaluating, and mitigating hazards in the workplace. (S/RID No. 6 and S/RID No. 10).

- The Radiological Control Program minimizes employee exposure to internal and external radiation during environmental restoration and waste management activities by developing and implementing requirements, plans, and procedures to minimize radiation exposures to ALARA. This program establishes controls to reduce personnel radiation exposure, establishes rigorous contamination control practices, and provides state-of-the-art monitoring equipment to ensure that radiation levels are maintained well below regulatory limits and ALARA. (S/RID No. 14).

- The Safety Analysis Program provides administrative and technical support to ensure that FDF line supervision complies with systems safety and nuclear criticality safety requirements (RM-2116 and RM-0027) that ensure the safe operation of FEMP. This program provides criteria for performing safety analyses that establish and evaluate the safety bases of all FEMP facilities and associated activities. (S/RID No. 9).

- The Soil and Miscellaneous Media Program assesses FEMP's environmental impact on the surrounding area from past and present operations. This program provides environmental monitoring by sampling soil and various media to assess potential exposure pathways to humans and the environment. (S/RID No. 5).

- The Water Monitoring Program provides oversight for liquid effluent releases, potable water systems, and storm water. This program maintains program management for the Spill Prevention, Control and Countermeasures Plan (SPCC) (PL-2194), the Best Management Practices Plan (BMP), and other plans mandated by the Clean Water Act. The Water Monitoring Program ensures the quality of data and documentation for National Pollutant Discharge Elimination System (NPDES) compliance and proper and timely notification and reporting of effluent releases to the environment, including reporting under SARA 311, 312, and 313. (S/RID 5).

FDF team leadership and DOE regularly conduct Facility Safety Assessments to audit a different area of the site and ensure hazard identification and corrective action are accomplished in a timely manner (RM-0021, SPR 1-3, Hazard Abatement). Senior leadership conducts safety walk-throughs that may include union representatives.

Team leadership ensures that policies, requirements, procedures, and work instructions are clear to their employees by defining work scopes, levels of effort required, interfaces with other departments or outside agencies, and deliverables. Line supervision performs routine observations of personnel performing activities and identifies, documents, and corrects deficiencies.

Team leadership ensures that emergency drills and exercises are conducted, provides feedback through mandatory critiques, and promptly incorporates lessons learned into existing emergency response plans and procedures.

Line supervision conducts regular safety briefings to reinforce training, address safety needs, discuss lessons learned and pertinent safety topics, and solicit employee suggestions and concerns. Team leadership actively investigates injuries and unsafe practices and accepts responsibility for the safety performance of their employees.

FDF leadership supports the walk-your-space philosophy by providing the appropriate communication channels and support for identifying and correcting hazards in an employee's work space. Supervisors exemplify the walk-your-space philosophy by examining their work area each day for potential hazards and ensuring their employees also walk their space.

FDF team leadership delegates authority for safety to the lowest practical level of supervision. All supervisors, as well as employees, are responsible for safety within their areas.

Team leadership actively participates in safety recognition activities of all employees..

Host/Tenant Responsibilities

FDF is committed to maintaining and making available information and all records as required by Federal, State, and local regulations, and instructs employees to cooperate fully and courteously at all times with authorized ES&H representatives.

FDF senior leadership has the right to know who is entering its premises or managed properties. Upon presenting appropriate credentials to a member of team leadership, an inspector may enter the premises without delay. The highest official available within FDF leadership determines whether or not the person is a bonafide government safety inspector before the person is allowed to inspect the premises.

External Communications

FDF implemented a coordinated public participation program so that public involvement with news media and congressional or intergovernmental entities is not fragmented and uncoordinated (S/RID 23).

Compliance with DOE-Prescribed ES&H Standards

Compliance with all DOE-prescribed ES&H standards is mandatory for FDF and all FEMP subcontractors. DOE standards governing, or related to, ES&H at FEMP are outlined in RM-0016 in the following sections of the S/RID:

S/RID 3 Emergency Preparedness and Management
S/RID 5 Environmental Protection
S/RID 6 Fire Protection
S/RID 8 Management Systems
S/RID 9 Nuclear and Systems Safety
S/RID 10 Occupational Safety and Health
S/RID 11 Operations
S/RID 13 Quality Assurance
S/RID 14 Radiological Protection
S/RID 16 Training and Qualification
S/RID 17 Environmental Restoration and Waste Management
S/RID 21 Project Control
S/RID 23 Public Involvement

In the event there is a conflict between standards, the most stringent applies. FDF and FEMP subcontractors are obliged to protect their employees from recognized hazards even if no regulatory requirement specifically addresses that hazard.

FDF develops ES&H requirements, plans, and procedures that govern all work at FEMP, audits FDF and subcontractor activities, maintains audible records, and requires subcontractors to maintain similar records.

For construction activities, FDF contracts only individuals or companies who are ES&H conscious and requires that each subcontractor be systematically and equally evaluated using the guidelines and instructions in RM-0021, SPR 1-7, Subcontractor Pre-Qualification and Pre-Job Safety Requirements.

Active Management Involvement

All levels of FDF leadership are responsible for environmental safety and health and for taking a leadership role in ensuring that ES&H requirements are factored into their work activities, understood by all employees, continually assessed, and fully implemented.

Utilizing employee input where appropriate, senior leadership establishes operating standards that clearly define responsibilities and authorities and integrates the standards into programs, requirements, plans, and procedures.

FDF leadership maintains an Open Door Policy to encourage all employees to feel free to request information or advice from team leadership, or to discuss problems and conditions that appear to be operating to either their or the company's disadvantage.

SAFETY AND HEALTH GUARANTEES

The FEMP Environmental Safety and Health Program Implementation Plan and all FEMP safety and health procedures will guarantee to employees the following rights:

1. The **RIGHT TO KNOW** the hazards associated with the performance of the employee job, including timely notice of new hazards or developments, and access to the employee's medical and exposure records within the time frames mandated by applicable regulations or orders.

2. The **RIGHT TO REPORT** safety and health concerns or violations without fear of reprisal, including the right to report to OSHA or DOE.

3. The **RIGHT TO REFUSE OR STOP WORK** that the employee reasonably believes to be hazardous by notifying the supervisor of the work, including the right to use the formal grievance process to resolve such issues. As part of this Right, no employee will suffer any reprisal or the loss of regular hourly pay for refusing such work.

4. The **RIGHT TO ACCESS** safety, and health information, including completed accidents/incident investigations, consistent with applicable laws, including restrictions of the Privacy Act. The right to participated in investigation and the right to talk to inspectors form governmental agencies. This right to access applies to any employee or their designated Union representative.

5. The **RIGHT TO INPUT** regarding safety, and health issues through the continuation of various applicable Joint Employee/Management Safety and Health Committees and initiatives.

6. The **RIGHT TO PERSONAL PROTECTIVE EQUIPMENT (PPE)** provided by the Company.

7. The **RIGHT TO PARTICIPATE IN THE SAFETY EXCELLENCE PROCESS** by providing input into the planning and approach to job tasks, development of protection methods, and feedback on job training.

Employee Responsibilities and Personnel Accountability

People are the most critical element in the success of an ES&H Program. Employee involvement in all phases of the ES&H Program enhances awareness of the importance of environmental safety and health throughout the organization and contributes to program effectiveness by encouraging employees to contribute their knowledge and insight to the program.

FDF encourages employee involvement and accountability and provides prompt feedback to employee suggestions and concerns (RM-0021, SPR 1-4). Team leadership responsibility at FEMP is complemented by employee suggestions and their active involvement in keeping work places safe.

DOE, FDF and its subcontractors, and community stakeholders work together to ensure environmental safety and health. FDF conducts regular stakeholder meetings to communicate pertinent FEMP information to interested parties. Continuing participation by these stakeholders, both individually and as a group, helps FEMP leadership understand stakeholders' interests and concerns and gives stakeholders the opportunity to state their opinion of the activities and progress made at FEMP. There are several cases where stakeholder recommendations and general public concerns have already affected decisions at FEMP. The Fernald Citizens Task Force represents several groups and public interests at FEMP and provides public consensus, where possible, concerning solutions and future actions at Fernald. Many FEMP employees participate as stakeholders through the Fernald Envoy Program.

The FEMP Emergency Plan (PL-3020) includes Mutual Aid Agreements with offsite response organizations. FDF communicates changes to the Emergency Plan to appropriate offsite agencies and ensures that Mutual Aid Agreements are reviewed annually and revised as appropriate.

FDF annually publishes a Site Environmental Report, assists in studies by outside agencies (e.g., the Centers for Disease Control) to determine possible epidemiological effects as a result of FEMP operations, and provides oversight of University of Cincinnati graduate and intern students and applied Radon Research Projects/Theses.

EMPLOYEE INVOLVEMENT

Employee Rights

Employees who feel their personal safety and health is or has been jeopardized have the right to refuse or stop work without fear of reprisal, harassment, or retaliation and must make these situations immediately known to their supervision, safety and health representative, team leadership, OS&H, or senior leadership (RM-0021, SPR 1-4, Employee Concern Program).

FDF PROVIDES ALL FEMP EMPLOYEES WITH THE FOLLOWING GUARANTEED RIGHTS:

THE FERNALD SAFETY AND HEALTH BILL OF RIGHTS

Preamble

FDF guarantees to all workers at the Fernald site that the primary mission is the safe, early, and least-cost cleanup and remediation of the Fernald site, while preserving the safety and health of each employee. To achieve our mission, FDF provides an avenue for all individuals to contribute to the safety excellence process. FDF requests that all Unions, employees, supervisors, managers, and subcontractors will reaffirm their commitment to work to prevent accidents and eliminate the conditions that lead to injuries and illnesses.

The SPR Manual (RM-0021) is a composite of employee, supervisor, team leadership, and technical input that provides updated, concise safety and health requirements for persons working at or visiting FEMP. The Rad Con Manual (RM-0020) provides updated, concise radiological requirements. FDF has encouraged active employee involvement in safety and health by making the SPR and Rad Con Manuals "evergreen" documents with Revision and Control sections that provide a mechanism for **any** employee's contribution to FEMP ES&H requirements.

FDF actively solicits employee involvement during daily safety briefings, pre-job planning, and Safety First work group meetings.

ES&H Concerns Reporting System

FDF empowers FEMP personnel with the authority to report unsafe conditions or practices without fear of reprisal. Every person at FEMP has refuse/stop work authority as specified in the Employee Bill of Rights.

FDF encourages employees to participate in a Safety First work group, and through that work group to participate in identifying and resolving safety concerns, including questions and input on the work to be performed and the requirements, procedures, and work instructions presented for the job. Team leaders and supervisors participate in Safety First work groups in their area to provide active support in the timely resolution of safety issues.

The FDF Employee Concern Program (ECP) provides guidance for submitting, investigating, and resolving safety and health suggestions, concerns, or complaints by FEMP employees (RM-0021, 1-4). FDF strongly encourages subcontractors to participate in the this program. A Safety Hotline was established to provide second and third shift employees, employees who desire to remain anonymous, or employees who do not wish to complete a form, an alternative to submitting a written suggestion/concern form.

ES&H Committees

DOE and FDF established and maintains a Central Safety Committee (CSC) that determines and approves annual site safety goals. The CSC consists of one DOE representative, two FDF representatives, and seven Union representatives, with members of the Safety and Health organization providing technical support. The CSC establishes broad safety goals and delegates responsibilities to line supervision, the Safety and Health organization, and other existing safety committees. This committee resolves safety and health issues when other existing mechanisms have been exhausted or when other mechanisms do not exist.

DOE and FDF organized a Safety First Team, which is comprised of team leadership and employees in both organizations, to improve FEMP's safety culture. The team is revising existing programs and developing and implementing new safety and health strategies. Safety First is striving to promote employee involvement and ownership in FEMP safety and health, strengthen safety and health training, and develop additional rewards and recognition for employee contribution to safety and health at FEMP.

All tasks undertaken at FEMP incorporate methods that minimize the potential for accidents, exposure to hazardous materials, or unplanned releases to the environment. To achieve these objectives, all employees receive proper training for the task, use approved methods and protective equipment, and follow approved procedures and work instructions.

Safeguarding safety and health and protecting the environment are conditions of employment at FEMP and FDF places responsibility for the safety and health of FEMP workers and the public, and protection of the environment, on each individual. FDF expects **everyone** to accept responsibility for the safe conduct of their work and for conduct of that work in compliance with all ES&H regulations. A Walk-Your-Space philosophy promotes employees becoming familiar with any area where they are working and identifying and correcting hazards under their control. Employees are responsible for correcting ES&H deficiencies in their area where possible and for immediately reporting unsafe acts or conditions to their team leadership.

Employees have the responsibility to follow ES&H policies, requirements, procedures, and work instructions specified for FEMP and for the specific job they are performing. Employees also are responsible for identifying and recommending changes to policies, requirements, and procedures to ensure they best reflect the nature and activities of the job being performed. Disciplinary action may be taken against employees who disregard ES&H policies, requirements, procedures, and work instructions as detailed in HR-145, Employee Discipline.

ES&H Program Promotion and Employee Involvement

Employees have a significant impact on improving the ES&H Program. FDF fosters a "no-fault" attitude to encourage all employees to identify nonconforming items and processes, and suggest improvements. Employees also participate in work planning through the Enhanced Work Planning initiative.

To achieve our mission, FDF provides an avenue for each individual to contribute to the safety excellence process and encourages employee involvement in every phase of the operation (RM-0021, Revision and Control Section, and RM-0020, Revision and Control Section). FDF expects that the Unions, and every employee, subcontractor, supervisor, and team leader will reaffirm their commitment to prevent accidents and eliminate the conditions that lead to injuries.

FDF develops and administers safety recognition programs to provide acknowledgment to employees who demonstrate exceptional Safety First behavior, attitude, or action.

Company Newsletters (LET'S TALK, FORWARD!), the weekly Employee Update Bulletin, weekly Safety Bulletins, and Lessons Learned documents distributed through electronic mail, internal mail, and racks at work locations, are published regularly to keep FEMP personnel informed of potential worksite hazards, important announcements, and new developments. Employee ideas and concerns are incorporated into FDF communications.

Job Safety Analyses (JSAs) and Project-Specific Health and Safety Plans (PSHSP)/Matrices are mechanisms for reviewing jobs to identify hazards and recommend procedures and work instructions (RM-0021, SPR 2-7, Job Safety Analysis, and SPR 2-12, Project-Specific Health and Safety Plans). JSAs supplement plans, procedures, and work instructions that have not addressed all safety hazards. JSAs are not required when plans, procedures, or work instructions adequately address safety and health or a previously developed JSA is applicable to the job/task.

FDF maintains an auditable Safety Analysis Program (RM-2116 and RM-0021, SPR 2-9, Safety Analysis) encompassing systems safety and nuclear criticality safety (RM-0027), that provides for safety analyses, operation monitoring, and nuclear criticality safety analyses for all facilities, projects, and activities in which there is a potential for harm to workers, the public, or the environment. The Safety Analysis organization documents unreviewed safety questions, compliance analysis, and performance analysis.

FDF conducts risk assessment analysis on samples of air, soils and sediments, and various other media to measure FEMP's compliance status with applicable environmental standards and guidelines.

FDF developed the FEMP Hazard Assessment that serves as the basis for the Emergency Preparedness Program.

Compliance Inspections

FDF cooperates with and supports the activities of DOE and external oversight organizations, such as the Defense Nuclear Facility Safety Board (DNFSB), in the review and investigation of FEMP projects and activities.

FDF established and implemented a Quality Assurance (QA) Program to ensure that risks and environmental impacts are minimized and that environmental safety and health, reliability, and performance are maximized through the application of effective management systems commensurate with the risks posed by the facility and its work (RM-0012). QA conducts initial and routine documented compliance inspections of FEMP systems and activities, performs audits and/or safety appraisals of ES&H programs, and requires corrective action responses where deficiencies are reported to ensure closeout of occurrence and deviation reports.

FDF established and implemented a Facility Safety Assessment Program to identify and mitigate safety deficiencies and discrepancies within and around buildings that may pose a threat to worker safety. This is an ongoing program to ensure worker safety while closely monitoring facility conditions.

ES&H organizations conduct periodic internal formal self-assessments, inspections, and appraisals of FEMP activities to ensure that all activities involving FDF, DOE, or Subcontractor personnel are conducted according to established DOE guidelines, internal facility procedures, and standard industry practice.

FDF organized additional committees for the purpose of considering safety and health issues and encouraging employee participation in the development of good safety and health practices. These committees include, but are not limited to: the President's Safety Committee, the Tri-Partite Safety Committee, the Union-Management Safety Committee, the Construction Union Subcontractor Safety Committee, and the Safety Work Groups. FDF also endorses additional group safety committees and meetings. RM-0021, SPR 1-6, Safety Committee and Groups, provides detailed information on safety and health committees and groups.

To protect employees and the environment from asbestos exposure, FDF established an Asbestos Management Committee to assess asbestos management goals and identify the need for new or revised asbestos policies, requirements, or procedures to ensure regulatory compliance.

The ALARA Committee assesses, promotes, and ensures that ALARA concepts, processes, and practices are incorporated into FEMP activities that will, or have the potential to, cause dose to general employees, the public, and the environment.

The Independent Safety Review Committee (ISRC) addresses nuclear criticality safety and systems safety issues on behalf of the FDF President. The ISRC formally reviews all nuclear criticality safety and systems safety documentation transmitted from the FDF President to DOE-FEMP.

WORKSITE ANALYSIS

Analysis of Facilities, Processes, or Equipment

Team leadership and supervision ensure that all applicable ES&H practices are considered when planning work at FEMP. FDF ensures that design, engineering, and administrative controls are established in new or modified facilities/equipment to identify and eliminate or control potential and existing ES&H hazards and to minimize worker exposure to ALARA.

FEMP employees participate in Enhanced Work Planning that formally brings together a multi-disciplinary team to develop, review, and approve work packages in one step, well in advance of the schedule work window. Through employees acting in concert with Safety and Health, Industrial Safety, Occupational Medicine, Engineering, and Quality Assurance professionals in the Enhanced Work Planning process, FDF is ensured of timely input and utilizes the benefit of worker site specific experience, work process knowledge, and work area conditions.

DOE and FDF team leadership conduct scheduled Facility Safety Assessments of FEMP facilities, processes, and equipment to observe and analyze problems and identify potential hazards. When inspections are completed, summaries are prepared, evaluated, and submitted to team leadership to assess job practices, success, and/or ES&H concerns needing resolution.

Performance measures, generall an associated performance goal, are prepared to monitor the effectiveness of the m. These performance measures and goals are reviewed annually, and revised or adjusted as appropriate in order to ensure that they remain meaningful measures. During this annual review, performance measures and goals may be deleted, and new ones

Work Activities

ES&H personnel provide information for team leadership, engineers, and designers in the earliest phases of project development to minimize ES&H problems and cost.

Team leadership incorporates safety limits, operating limits, surveillance requirements and administrative controls, and instructions that define the operational boundaries of activities. Team leadership and supervisors train, brief, and prepare employees to comply with these tions and controls to ensure the safety and health of workers and the public, and ion of the environment.

Facility owners, who have been delegated responsibility for specific FEMP facilities, ensure that all activities and operations within their respective facilities are authorized under the existing safety basis or subsequently reviewed and authorized before being conducted.

FDF minimizes personnel exposure to radiation and radioactive contamination, the migration of contamination, and the generation of airborne radioactivity to the extent reasonably achievable. Radiological Control performs periodic surveys (RM-0020, RCR 3-1, Radiological Surveys) in both controlled and uncontrolled areas of FEMP to document the effectiveness of the Radiological Control Program and to identify areas where radiological control efforts must be strengthened.

FDF has a well developed Radiological Contingency Plan to deal effectively with radiation or radioactive material emergencies. Unusual events or incident occurrences may happen that would not require activation of the plan but might potentially have significant consequences if not dealt with promptly and appropriately. A radiological incident includes all radiologically related loggable, incident, unusual, and emergency situations. It is important to identify these incident events, the initial response to mitigate the situation, follow-up actions to limit the severity of the incident and to initiate recovery, assessment, and reporting.

FDF promote fire prevention, maintains a reliable water supply of adequate capacity for fire protection, uses noncombustible construction when feasible, provides automatic extinguishing systems where required, and utilizes special hazard protection where needed.

FDF uses safety analyses (RM-0021, SPR 2-9, and RM-2116) to establish the basis for contractor-performed SSRs, RAs and DOE performed ORRs, as required, for FEMP projects and activities where there is a potential for harm to workers, the public, or the environment. To ensure activities are performed within specified limitations of safety analyses, FDF periodically analyzes performance of work and conduct of operations through monitoring and auditing activities, which are documented, along with the findings.

Team leadership, supervisors, and ES&H professionals regularly inspect work areas to ensure safe workplaces and facilitate identifying and correcting deficient work practices, unsafe conditions, or defective equipment. FDF conducts and documents work site safety and fire protection inspections regularly and inspects various buildings, structures and/or areas monthly for fire safety.

Assessment and Appraisal Programs

Conducting safety walk-throughs at all work locations is ' element to improving safety performance and reinforcing safe acts and pra FDF team leadership regularly performs safety walk-throughs to observe work in progre sess the safety features of the activities, and address safety concerns (RM-0021, SPR Safety Walk-throughs)

FDF created and implemented an effectiv ons Learned Program (EM-0019, Sitewide Lessons Learned) to facilitate a process v FEMP workers under use, and incorporate the concepts of lessons learned into daily tasks. FDF c es to complex-wide DOE lessons learned programs and strive ntinuously impr tegrate its program.

The ES&H program supports additional QA of contracted lab services, performance of audits of safety and health nd closeout of deviation reports.

FDF conducts proactive monthly facility assessments to minimize the potential for fire, safety, and housekeeping hazards.

FDF performs internal radiological control self-assessment through periodic formal assessments, inspections, and appraisals of radiological activities and documents and tracks corrective action (RM-0020, RCR 5-1, Radiological Assessments and Inspections).

Performance Analysis

Analysis of ES&H performance identifies program strengths and weaknesses and their underlying causes, and provides team leadership with feedback they can use to strengthen the program's effectiveness.

Sources of information for performance analysis include compliance inspections, assessment and appraisal programs, information on injury, illness, and workers' compensation trends, investigations of accidents and near misses, and lessons learned from both undesirable and desirable outcomes.

Access and Exposure Controls

FDF verifies prerequisite conditions, such as tagouts and system isolation in accordance with OP-0004, Lockout/Tagout (Hazardous Energy and Material Control, and technical work documents before work is initiated and uses work permits (RM-0021, SPR 2-8, Work Permits) to provide written authorization and instructions before beginning work in any area of FEMP.

FDF requires the use of protective clothing for safety reasons and when there is a significant potential for personnel or clothing to become contaminated (RM-0021, SPR 2-2, Personal Protective Equipment; RM-0020, RCR 3-4, Personal Protective Clothing; RM-0020, RCR 4-4, Health Physics Facilities). FDF provides PPE and respiratory protection equipment and ensures that it is maintained in a sanitary and reliable condition and used as instructed.

Anyone accessing the process operating facility for the first time is oriented to the hazards associated with the operation of the facility by a Health and Safety Briefing.

The Radiological Work Permit (RWP) Program (RM-0020, RCR 3-2, Radiological Work Permits) outlines special radiological controls, precautions, surveillance, and/or instructions. The RWP is an administrative mechanism to inform workers of area radiological conditions and entry/exit requirements and provide a means to relate work exposure to a specific work activity. Components of the RWP process include: limitation of exposure to personnel performing the work (RM-0020, RCR 2-1, Radiological Dosimetry - Occupational Exposure), minimization of the spread of contaminants or radiation exposure to adjacent personnel, and provision for augmented monitoring and surveillance when required.

FDF ensures that occupationally-derived contamination (RM-0020, RCR 3-3, Contamination Control) remains within the controlled areas, that contamination is contained at the source when practical (RM-0020, RCR 2-5) and that engineering controls (RM-0020, RCR 3-6, Access Control Program) are used to the fullest practical extent to minimize the spread of contamination from the source. Where engineered controls are not practical, administrative controls (RM-0020, RCR 4-1) are in place to control contamination spread by personnel, vehicles, equipment, or radioactive material brought out of the controlled area (e.g., radioactive laboratory samples).

FDF employs methods (e.g., required surveys, frisking, packaging, labeling, etc.) to alert individuals to the potential hazards present and requires the use of protective clothing when there is significant potential for personnel, personal clothing, or company-issued clothing to become contaminated (RM-0020, RCR 3-4).

FDF requires decontamination (RM-0020, RCR 3-5, Personnel Decontamination) when detectable skin or hair contamination is identified on an individual at FEMP. Washing with soap and water is the most successful personnel decontamination technique for radioactive material contamination; however, more vigorous techniques may be required in certain situations (e.g., rough skin, hair, body cavities). FDF reports personal clothing contamination according to DOE Order 232.1.

HAZARD PREVENTION AND CONTROL

Hierarchy of Controls

FDF uses engineered and administrative controls where possible to ensure that ES&H standards are met, hazards are abated, radiation levels are controlled, and that radioactive material is contained for effective environmental protection. FDF initiates controls during the development of design specifications and drawings to ensure that engineered controls are fully considered before any other controls are designed into a new project or modified facility.

The Program Services organizations establish the programmatic aspects of ES&H documentation, document control, and records management and provide oversight of those activities performed by the other ES&H departments.

Polices, requirements, plans, procedures, and work permits provide administrative controls and are followed up with training and briefings. FDF manages ES&H technical publications, procedures, and documentation records according to applicable DOE Orders and Federal and State regulations (MS-0002, Records Management; MS-0003, Document Filing System; MS-1001; MS-1002; and 602-0002).

The SPR Manual (RM-0021) functions as an OS&H administrative control for the following categories: Personnel Protection; Walking and Working Surfaces; Hand/Power Tools; Electrical Safety; Welding, Cutting, and Brazing; Motor Vehicles and Mechanized Equipment; Compressed Gas and Air Equipment; Construction Activities; Medical; Fire Protection; and Industrial Hygiene.

The Chemical Hazard Communication Program (RM-2086) ensures employees are provided with chemical hazard information in the form of signs, labels, training, and Material Safety Data Sheets (MSDS) that are located in each facility, Medical, and Industrial Hygiene.

A system of engineered and administrative controls allows the use of radioactive sealed sources and radiation producing machines at FEMP while maintaining radiation exposure to personnel ALARA. These controls include specific requirements for receipt, inventory, storage, transfer, disposal, and integrity testing (RM-0020, RCR 2-5, Radiation Source Control).

FDF governs all work activities with radiation or radioactive material at FEMP by written and approved procedures or other technical basis documents (RM-0020, RCR 4-1, Radiological Protection Procedures). Radiological Control generates these documents, and depending on subject matter, they may apply universally to all personnel onsite, or more specifically, to activities conducted by Radiological Control or the Project Safety and Health organizations.

FDF estimates ionizing radiation doses to the population from all exposure pathways, confirms predictions of public dose on models, and provides for spatial and temporal analyses.

FDF maintains a highly protected risk/improved risk level of fire protection at all FDF managed facilities. All employees, subcontractors, managed facilities, programs, projects, and activities follow established fire safety criteria (RM-0021, Section 11, Fire Protection' and RM-0024).

FDF uses state-of-the-art equipment and analytical methods to support internal dosimetry monitoring according to DOE Order 5480.11, DOE/EH-0256T (DOE Radiological Control Manual), 29 CFR 835 (Occupational Radiation Protection), and RM-0020.

FDF maintains complete medical records for each employee from the time of the first examination and ensures information from an employee's health records is not disclosed without the employee's written consent, except as permitted by law or Federal regulation. Employees and Retirees may have access to their medical records according to MD-REC-002, Releasing/Removing Medical Records.

Emergency Preparedness and Response

Emergency preparedness and management provides the final barrier of the defense-in-depth concept for ensuring the safety and health of workers and the public and for protecting property and the environment in the event of an emergency. Emergency Preparedness programs enable organizations to respond to an emergency in a timely, efficient, and effective manner, resulting in improved mitigation of consequences.

FDF protects FEMP personnel, the public, and the environment through the process of emergency preparedness (PL-3020) that includes forming management and response organizations, training, drilling and exercising the organizations, and providing necessary facilities and equipment to control all potential emergencies. The Emergency Preparedness organization coordinates and supports event notification and reporting of all reportable occurrences and emergency events, coordinates sitewide activities to achieve the highest level of emergency readiness for the FEMP through drills and exercises, and develops and maintains emergency plans and implementing procedures sufficient to achieve the highest level of emergency response.

FDF ensures that no part of FEMP presents an unacceptable threat to the safety of its employees, the public, or potential insult to the environment resulting from a preventable fire by maintaining a highly protected risk/improved risk level of fire protection at all FDF managed facilities. All FDF employees, subcontractors, managed facilities, programs, projects follow established fire safety criteria.

FDF established and maintains Emergency Preparedness and Emergency Response programs in compliance with all applicable regulations and DOE Orders and coordinates and provides training for the Emergency Response organization, including: Emergency Operations Center staff, Emergency Duty Officer (EDO), Assistance Emergency Duty Officer (AEDO), Emergency Response Team, Medical, Security, and Radiological and Industrial Hygiene responders.

FDF oversees upgrades and refinements to the emergency Message System and the Off-site Emergency Warning System, maintains the EOC and the Mobile EOC in a state of operational readiness, and ensures an adequate level of integrated planning with the County Emergency Management Agency, the Red Cross, the State Emergency Management Agency, local fire departments/life squads/law enforcement, and area hospitals (PL-3043).

Hazard Abatement Program

FDF manages and appropriately addresses hazards identified at FEMP through Hazard Abatement requirements (RM-0021, SPR 1-3) that address Occupational Safety and Health Administration (OSHA) hazards requiring abatement, and provides a means to document that the hazards are appropriately abated in a timely manner through the Hazard Action Tracking System (HATS).

FDF team leadership is committed to reducing radiation exposures by applying the ALARA process in all activities that cause dose (RM-0020, RCR 5-4, ALARA Program). Radiation dose is maintained as far below the DOE general public and occupational radiation worker dose limits as social, technical, economic, practical, and public policy considerations permit.

FDF mitigates incidents involving radiation and radioactive material in a timely manner and in such a way as to minimize radiation exposure, radioactive materials contamination, or injury of personnel. Limiting damage or adverse impact on facilities or the environments is of prime importance, but secondary to the value and qualify of human life (RM-0020, RCR 5-5, Incident and Event Response/Follow-up).

Medical Care and Surveillance

An occupational medical program (RM-0021, Section 10, Medical; and Medical procedures) for the site population provides routine medical treatment, treatment following accidents/injuries, and gives employee health examinations in accordance with DOE Order 440.1, construction and industry standards 29 CFR 1910 and 1926, and the Americans Disabilities Act (29 CFR 1630) to provide initial and continual assessment.

FDF performs routine and voluntary examinations for employees at regular intervals throughout the course of their employment and provides responsible first line supervision with notification of unhealthy work situations detected by the occupational medical staff. Medical also makes fitness for duty determinations for employees for all conditions that may influence performance or work suitability.

Managed care of ill or injured employees by occupational physicians is highly desirable to maximize recovery and safe return to work and to minimize lost time and associated costs. FDF provides a standard method for the timely documentation of employee statements regarding actual or alleged occupational illnesses or injuries (RM-0021, SPR 1-8, Accident/Illness Reporting and Investigation) and provides required first aid medical treatment. Long-term treatment of nonoccupational injury and illness is not considered to be a routine responsibility of an occupational medical program.

FDF administers medical surveillance programs for hearing conservation, respirator use, confined space work, heavy metal exposure, asbestos, bloodborne pathogens, substance abuse, and others if necessary.

All visitors receive OS&H orientation designed for the specific purpose of the visit that includes, but is not limited to:

- FEMP OS&H policy
- Visitors' responsibilities
- Compliance with postings
- Specific hazards in the area visited and means for minimization/elimination
- Area and site-specific emergency procedures

FDF ensures that visitors entering a controlled area are trained in the aspects of radiation protection commensurate with their potential for exposure to radiological hazards and that orientation files are documented and maintained in an auditable manner (RM-0020, RCR 5-3, Radiological Training for General Employees, Radiological Workers, Visitors, and Instructors).

A Safety and Health Briefing orients visitors and site employees accessing the process operating facility for the first time to the hazards associated with the operation of the facility.

FEMP Employee ES&H Training

FDF trains new employees on basic safety rules, regulations, and equipment used at FEMP through General Employee Training (GET), which includes elements specified in applicable DOE Orders and Federal regulations. GET Training addresses employee rights and responsibilities, mechanisms for reporting OS&H concerns, information on reporting and responding to emergencies, information on potential hazards, and methods for accessing employee exposure monitoring data and medical records. FDF periodically reviews and updates the technical content of GET training and ensures these training sessions are maintained in an auditable manner.

ES&H team leadership establishes individual development plans to provide necessary training and experience for their employees and encourage employees to participate in professional organizations and to obtain certification in their areas of expertise.

Team leadership ensures that those knowledgeable in ES&H have prepared appropriate procedures and have provided training that emphasizes safe methods. Supervisors follow up on new employee training by providing specific information as to the hazards associated with the workplace through monthly safety meetings and safety awareness briefings.

FDF provides introductory courses to enable employee representatives, safety observers, and members of the Safety Awareness Team to recognize, analyze, and report unsafe and unhealthful working conditions and acts, and to participate in joint employee/team leadership safety and health functions.

FDF maintains qualified fire protection engineering and fire safety organization and a fully staffed, trained, and equipped emergency response organization (ERT Manual) that is available for immediate response. A listed alarm system and an emergency event notification system are maintained fully operational at all times.

FDF maintains the Meteorology Program that supports the EOC with dose calculation models during accidental chemical emissions from the site and modeling support to measure and model radon emissions.

ES&H TRAINING

Training Needs and Records

FDF goes beyond traditional ES&H training to motivate and instill a proactive ES&H ethic and culture wherein personnel continually strive to perform work more safely and efficiently. Education and training are vital tools in the continuous performance improvement of the ES&H Program.

FDF ensures that training programs meet DOE training requirements and prepares the workforce to perform work safety through performance based training. Training provides programs for professional development for FEMP employees and operates the Career Development Center to support the workforce transition initiative for preparing employees for increased job responsibilities and changing conditions.

The Training organization provides site access training, analyzes job functions to provide a basis for developing required training and certification training, monitors retraining requirements to keep team leadership informed of the qualification status of their employees, and coordinates retraining programs.

Team leaders and supervisors ensure their employees attend ES&H training, monitor their employees understanding of training through work group meetings and their daily job performance, and lead by example to promote compliance with FDF ES&H policies and requirements.

Team leadership periodically reviews training programs to ensure they are current, assesses the need for new or revised training, and implements training programs accordingly.

FDF generates and retains current records of all formal training provided to each employee and visitor according to procedure ADM-TR-011 and maintains certification and qualification records of designated personnel. FDF maintains auditable records for emergency preparedness according to DOE 5500.7A.

Visitor Orientation

Visitors to FEMP attend visitor orientation to become familiarize with criticality alarms and responses, and alarm drills and to recognize controlled areas.

On-shift training adheres to established training programs so that instructional uniformity is maintained and trainees are supervised by qualified persons. FDF makes every effort to cross-train individuals where possible.

FDF trains technically responsible individuals and qualified safety evaluators to perform their respective functions under the FDF Unreviewed Safety Question (USQ) Program. The associated lesson plans and other related documents associated with these training programs are maintained in an auditable manner.

Various departments implement a formal training program for the instruction and qualification of all personnel involved in the emergency response organizations and documents and individually tracks EOC staff qualifications on a fiscal year basis.

ES&H Team Leadership and Supervisor Training

FDF incorporates formalized supervisory and team leadership training into training programs. All team leadership and supervisory ES&H training programs contain, at a minimum, information necessary to protect employees from environmental safety and health hazards in their jobs and to encourage employee participation in the ES&H Program.

Team leadership and supervisor training responsibilities cover the areas of:

- Safety performance requirements and measurements
- Investigation and evaluation techniques
- Hazard identification, evaluation, and control
- Contractor and DOE policies of the ES&H Program
- FEMP ES&H goals and objectives
- Hazardous materials management and control programs
- Motivation and training techniques
- Methods of integrating ES&H topics into job and task training
- Use and maintenance of PPE
- Enforcement of ES&H requirements
- Conformance
- Reporting
- Planning
- Budgeting
- Programming

FDF provides team leaders and supervisors with training on the specific nuclear and system safety issues to which they are responsible and ensures team leader and supervisor training sessions are documented and maintained in an auditable manner.

Qualifications and Site Specific Training of Employees

FDF provides OS&H site specific training to non-supervisory personnel upon initial assignment with annual refresher courses in the areas of:

- Hazard identification and control for worksite, occupation, or task
- Safety Performance Requirements, as applicable to the worksite
- Contractor and DOE policies on the Safety and Health Program
- Specific work area policies on safety and health
- Equipment operator training, where applicable
- Minimizing risks
- Rights and responsibilities, as related to DOE
- Applicable emergency procedures and safety procedures

FDF conducts radiological control training and training of radiological workers in accordance with RM-0020, RCR 5-3 and RCR 5-2, Radiological Control Training for Radiological Control Technicians). Personnel entering a controlled area are trained in the aspects of radiation protection to a level commensurate with their potential for exposure to radiological hazards.

Attachment A
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FDF ES&H DOCUMENT HIERARCHY

Sitewide External Requirements Document

RM-0016 - *Management Plan*

Sitewide Plans and Internal Requirements Documents

Environmental Protection

IM-6016	FDF Asbestos Control Program
RM-0031	Asbestos Operations and Maintenance Work Practices
PL-1002	Fernald Site Environmental Monitoring Plan
PL-2194	Fernald Environmental Restoration Management Corporation Spill Prevention Control and Countermeasure (SPCC) Plan
PL-3008	NESHAP Subpart H Program Plan (NSPP)
PL-3018	FEMP Asbestos Management Plan
PL-3025	National Environmental Policy Act (NEPA) Compliance Plan
PL-3028	Environmental Protection Implementation Plan
PL-3034	Asbestos Program Quality Assurance Plan

Fire Protection

RM-0024	Fire Protection Requirements Manual

Medical & OS&H

IM-7001	Decontamination Manual
RM-0007	FEMP Respiratory Protection Requirements Manual
RM-0011	Control of Occupational Exposure of Bloodborne Pathogens
RM-0021	Safety Performance Requirements Manual
RM-0045	FDF Hoisting and Rigging Manual
RM-2086	Chemical Hazard Communication Program
RM-3001	Laboratory Chemical Hygiene Manual

Radiological Control

RM-0015	FEMP ALARA Requirements Manual
RM-0020	Radiological Control Requirements Manual
RM-0026	Establishment & Management of Radioactive Material management Areas

Attachment B
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ES&H PIP LIST OF ACRONYMS

AEDO	Assistant Emergency Duty Officer
ALARA	As Low as Reasonably Achievable
BMP	Best Management Practices Plan
CAM	Cost Account Manager
CERCLA	Comprehensive Environmental Response Compensation and Liability Act
DNFSB	Defense Nuclear Facility Safety Board
DOE	Department of Energy
ECP	Employee Concern Program
EDO	Emergency Duty Officer
EOC	Emergency Operations Center
ERT	Emergency Response Team
ES&H	Environmental Safety and Health
FAM	Functional Area Manager
FDF	Fluor Daniel Fernald
FEMP	Fernald Environmental Management Project
FERMCO	Fernald Environmental Restoration Management Corporation
GET	General Employee Training
HATS	Hazard Action Tracking System
JSA	Job Safety Analysis
MSDS	Material Safety Data Sheet
NEPA	National Environmental Policy Act
NPDES	National Pollutant Discharge Elimination system
OS&H	Occupational Safety and Health
OSHA	Occupational Safety and Health Administration
P&IC	Project and Information Control
PEP	Program Execution Plan
PIP	Program Implementation Plan
PL	Plan
PPE	Personal Protective Equipment
PSSHP	Project-Specific Safety and Health Plan
QA	Quality Assurance
RA	Readiness Assessment
RCR	Radiological Control Requirement
RCRA	Resource Conservation and Recovery Act
REM	Radiological Environmental Monitoring
RM	Requirements Manual
RWP	Radiological Work Permit
S&H	Safety and Health
SARA	Superfund Amendment and Reauthorization Act
SPCC	Spill Prevention, Control and Countermeasures Plan
SPR	Safety Performance Requirement
S/RID	Standards/Requirements Identification Document
USQ	Unresolved Safety Question
VPP	Voluntary Protection Program
WMO	Waste Management Operations